

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Case No. 12-12020 (MG)
Residential Capital, LLC, et. al.)	Chapter 11
Debtors)	Jointly Administered
)	
Karen M. Rozier,)	
)	
Appellant,)	1:15-cv-03248-KPF
)	
- against -)	
)	
ResCap Borrower Claims Trust,)	
)	
Appellee.)	

**THE RESCAP BORROWER CLAIMS TRUST’S COUNTER-DESIGNATION
OF ITEMS FOR RECORD ON APPEAL**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure and Rule 8009-1 of the Local Bankruptcy Rules for the Southern District of New York, the ResCap Borrower Claims Trust (the “**Borrower Trust**”), established pursuant to the terms of the *Second Amended Joint Chapter 11 Plan Proposed by Residential Capital, LLC, et al. and the Official Committee of Unsecured Creditors* [Docket No. 6030] (the “**Plan**”)¹ in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), hereby submits the following counter-designation of additional items to be included in the record on appeal in connection with the Notice of Appeal [Docket No. 8496] and Designation of Record and Statement of Issues of Record [Docket No. 8536], filed by appellant Karen Michele Rozier (the “**Appellant**”), from the *Memorandum*

¹ The Plan was confirmed by order of the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”) dated December 11, 2013 [Docket No. 6065] and the Plan’s effective date occurred on December 17, 2013. The Plan provides for the creation and implementation of the Borrower Trust. *See* Plan, Art. VI.F.

Opinion and Order Sustaining the ResCap Borrower Claims Trust's Objection to the Claims Filed by Karen Michele Rozier [Docket No. 7909] and *Memorandum Opinion and Order Denying Motion of Karen Michele Rozier for Reconsideration* [Docket No. 8446], which were entered by the Bankruptcy Court on December 22, 2014 and April 9, 2015, respectively.

The Borrower Trust designates the following additional items to be included in the record on appeal.²

Docket No.	Description
3294	Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1009, 3007 and 9019(b) Approving (I) Claim Objection Procedures, (II) Borrower Claim Procedures, (III) Settlement Procedures, and (IV) Schedule Amendment Procedures
6065	Order Confirming the Second Amended Joint Chapter 11 Plan Proposed by Residential Capital, LLC, et al. and the Official Committee of Unsecured Creditors
6137	Notice of Entry of Confirmation Order Confirming the Second Amended Joint Chapter 11 Plan Proposed by Residential Capital, LLC, et al. and the Official Committee of Unsecured Creditors and Occurrence of the Effective Date

Dated: May 14, 2015
New York, New York

/s/ Norman S. Rosenbaum
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² For the avoidance of doubt, the Borrower Trust's designation of any pleadings, notices and/or orders includes the designation of any and all exhibits filed with, attached to or otherwise referenced in such documents. For the further avoidance of doubt, the Borrower Trust designates all items designated by Appellant in Docket No. 8536, Case No. 12-12020 (MG).